

United States District Court

SEP - 6 2016

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Jaime Sanchez-Medina

PRINCIPAL

Case Number:

YOB: 1985

M-16-1666-M

the United Mexican States

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 5, 2016 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Juan Francisco Guevara-Rivera and Rommel Alexis Chicas-Vasquez, citizens and nationals of El Salvador, along with two (2) other undocumented aliens, for a total of four (4), who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Donna, Texas to the point of arrest near McCook, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

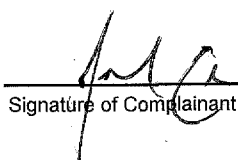
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On September 5, 2016, at approximately 10:30 a.m., Border Patrol Agent (BPA) Homero Delgado was working vehicle observation duties on Farm to Market Road (FM) 1017 near McCook, Texas when he received information to be on the lookout for a dark colored Dodge Ram with an elevated sheet of plywood in the bed of the truck seen near San Isidro, Texas.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No



Signature of Complainant

Jon M. Chan Senior Patrol Agent
Printed Name of Complainant

September 6, 2016
Date

McAllen, Texas
City and State

Peter E. Ormsby U. S. Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer

Approved Joseph Leonard
Sworn to before me and subscribed in my presence,

5:01 PM at

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

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RE: Jaime Sanchez-Medina

CONTINUATION:

While traveling south on FM 681, BPA Delgado saw a dark green Dodge Ram that matched the description of the vehicle relayed to him via service radio. BPA Delgado observed the vehicle approach the intersection of FM 681 and FM 490, and began to follow the vehicle for approximately a half mile before he observed the vehicle cut across the oncoming lane of traffic and pulled off to the side of the road and stopped. BPA Delgado activated his emergency lights to investigate the driver of the Dodge Ram and his actions that he had just witnessed.

BPA Delgado approached the suspect vehicle and identified himself as a Border Patrol Agent to the driver of the vehicle, who was later identified as Jaime SANCHEZ-Medina. When asked about his citizenship, SANCHEZ-Medina admitted that he was a citizen and national of Mexico, who was not in possession of any immigration documents that would allow him to be in the United States legally. BPA Delgado then asked SANCHEZ-Medina to get out of the vehicle, and subsequently advised him that he was being placed under arrest and that he would be transported to the Weslaco Border Patrol Station for processing.

While BPA Delgado was responding to the suspect vehicle location, other agents were responding to the area where the Dodge Ram was originally suspected of dropping off undocumented aliens. A subsequent search of that area resulted in the discovery of four individuals hiding in the brush. All subjects were questioned as to their immigration status, and all subjects admitted to being illegally present in the United States, and admitted that they did not possess any documents to be in the United States legally. All subjects were placed under arrest and transported to the Weslaco Border Patrol Station for processing.

PRINCIPAL STATEMENT:

Jaime SANCHEZ-Medina, a citizen of Mexico illegally present in the United States, was read his Miranda Rights, stated that he understood his rights, and agreed to answer questions without the presence of an attorney.

SANCHEZ-Medina stated that he was going to get paid \$500 to transport and drop off eight undocumented aliens from Donna, Texas to a location near McCook, Texas. SANCHEZ-Medina admitted to getting into the Dodge Ram in Donna, Texas, and that there were already three people that he knew to be undocumented aliens in the cab of the pickup, as well as other undocumented aliens in the bed of the pickup that were covered by plywood. SANCHEZ-Medina stated that a brush guide was in the pickup with him who told him where to drop the group off, which was near the intersection of FM 1017 and FM 681. He further stated shortly after dropping the group off, he saw the lights on the Border Patrol unit and stopped.

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CONTINUATION:

SANCHEZ-Medina admitted to agents during the interview that he had transported an undocumented alien previously to a house in Donna, Texas. SANCHEZ-Medina stated that he was transporting undocumented aliens to repay his debt of \$1,000 that he owed to the smuggling organization for being illegally crossed into the United States approximately two weeks prior to his arrest.

NOTE:

Jaime SANCHEZ-Medina was previously arrested on three separate administrative alien smuggling cases. On February 20, 2010, SANCHEZ-Medina was arrested and named as the principal of a 1 on 3 administrative alien smuggling case originating out of Rio Grande City Border Patrol Station. On November 3, 2010, SANCHEZ-Medina was again arrested on another 1 on 3 administrative alien smuggling case originating out of Rio Grande City Border Patrol Station where he was named as the principal. On July 10, 2011, SANCHEZ-Medina was arrested on his third 1 on 3 administrative alien smuggling case originating out of Rio Grande City Border Patrol Station where he was named as the principal.

MATERIAL WITNESS STATEMENTS:

Juan Francisco GUEVARA-Rivera and Rommel Alexis CHICAS-Vasquez were advised of their Miranda Rights, stated they understood their rights, and stated that they were willing to make statements without the presence of an attorney.

MATERIAL WITNESS 1 STATEMENT:

Juan Francisco GUEVARA-Rivera, a citizen and national of El Salvador, stated that he paid \$5,000 to a man named Manuel in El Salvador to be smuggled into the United States. GUEVARA-Rivera illegally crossed the Rio Grande River on September 1, 2016 at approximately 10:00 a.m. GUEVARA-Rivera stated that he got into the cab of a dark colored truck and sat in the rear seat behind the driver. GUEVARA-Rivera stated that four people got into the cab of the truck, and that the rest climbed into the bed of the truck. GUEVARA-Rivera stated that the driver of the truck told him and the others to get out of the truck and to head north. Juan GUEVARA-Rivera positively

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CONTINUATION:

identified Jaime SANCHEZ-Medina as the driver of the pickup truck through a photo lineup.

MATERIAL WITNESS 2 STATEMENT:

Rommel Alexis CHICAS-Vasquez, a citizen and national of El Salvador, stated that he paid \$5,000 to a man named Candido in El Salvador to be smuggled into the United States. CHICAS-Vasquez illegally crossed the Rio Grande River on September 1, 2016 at approximately 10:00 a.m.

CHICAS-Vasquez stated that he got into the cab of a dark colored truck and sat in the rear seat.

CHICAS-Vasquez stated that four people got into the cab of the truck, and that several others got into the bed of the truck. CHICAS-Vasquez stated that the driver of the truck got out and removed the plywood from the bed of the truck and instructed him and the others to go north in the brush.

Rommel Alexis CHICAS-Vasquez positively identified Jaime SANCHEZ-Medina as the driver of the pickup truck through a photo lineup.